

NICOLETTI HORNIG & SWEENEY
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In the Matter of the Complaint	:	15 Civ. 7388-NLH-KMW
	:	
of	:	ANSWER TO CLAIM
	:	
MATTHEW CARSON, as Owner of the vessel	:	
TAMMY LYNN, a 2005 28' Mako Model 284CC	:	
(HIN: MRKTM064C505) for Exoneration from or	:	
Limitation of Liability	:	

Plaintiff MATTHEW CARSON, as owner of the vessel TAMMY LYNN, by his attorneys, NICOLETTI HORNIG & SWEENEY, hereby answers the Claim of JOSEPH and KATHLEEN SANDEFUR (collectively "Claimants") upon information and belief as follows:

1. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph "1" of the Claim and leaves Claimants to their proof of those allegations.
2. Denies the allegations of Paragraph "2" of the Claim.
3. Denies the allegations of Paragraph "3" of the Claim because it calls for a legal conclusion.
4. Denies the allegations of Paragraph "4" of the Claim.
5. Denies the allegations of Paragraph "5" of the Claim.
6. Denies the allegations of Paragraph "6" of the Claim.
7. Denies the allegations of Paragraph "7" of the Claim.
8. Denies the allegations of Paragraph "8" of the Claim.

9. Denies the allegations of Paragraph “9” of the Claim.
10. Denies the allegations of Paragraph “10” of the Claim.
11. Denies the allegations of Paragraph “11” of the Claim.
12. Denies the allegations of Paragraph “12” of the Claim.
13. Denies the allegations of Paragraph “13” of the Claim.
14. Denies the allegations of Paragraph “14” of the Claim.
15. Denies the allegations of Paragraph “15” of the Claim.
16. Denies the allegations of Paragraph “16” of the Claim.
17. Denies the allegations of Paragraph “17” of the Claim.
18. Denies the allegations of Paragraph “18” of the Claim.
19. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph “19” of the Claim and leaves Claimants to their proof of those allegations.
20. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph “20” of the Claim and leaves Claimants to their proof of those allegations.
21. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph “21” of the Claim and leaves Claimants to their proof of those allegations.
22. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph “22” of the Claim and leaves Claimants to their proof of those allegations.
23. Denies the allegations of Paragraph “23” of the Claim.
24. Denies the allegations of Paragraph “24” of the Claim.
25. Denies the allegations of Paragraph “25” of the Claim.

26. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph "26" of the Claim and leaves Claimants to their proof of those allegations.

WHEREFORE, Petitioner MATTHEW CARSON demands judgment in his favor dismissing the claim of Claimants JOSEPH and KATHLEEN SANDEFUR and awarding the Petitioner the costs, disbursements and reasonable attorney fees of the action along with such other and further relief as this Court may deem just and proper.

Dated: Hackensack, New Jersey
May 3, 2016

NICOLETTI HORNIG & SWEENEY
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MATTHEW CARSON

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TO:

VIA ECF

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